

Ramon Rossi Lopez (admitted *pro hac vice*)  
California Bar No. 86361  
LOPEZ MCHUGH LLP  
100 Bayview Circle, Ste. 5600  
Newport Beach, CA 92660  
Telephone: (949) 737-1501  
rlopez@lopezmchugh.com

*Attorney for Plaintiffs Patricia J. Geberth and  
Roy J. Geberth*

Richard B. North, Jr. (admitted *pro hac vice*)  
Georgia Bar No. 545599  
Matthew B. Lerner (admitted *pro hac vice*)  
Georgia Bar No. 446986  
NELSON MULLINS RILEY & SCARBOROUGH LLP  
Atlantic Station  
201 17th Street, NW, Suite 1700  
Atlanta, GA 30363  
Telephone: (404) 322-6000  
richard.north@nelsonmullins.com  
matthew.lerner@nelsonmullins.com

*Attorneys for Defendants  
C. R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability MDL No. 2:15-md-02641-PHX-DGC  
Litigation

This document relates to

*Geberth v. C. R. Bard and Bard  
Peripheral Vascular, Inc.  
Case No. CV-16-03333-PHX-DGC*

**STIPULATION OF DISMISSAL  
WITHOUT PREJUDICE**

Plaintiffs Patricia J. Geberth and Roy J. Geberth (“Plaintiffs”) and Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), hereby stipulate to the dismissal of *Geberth v. C. R. Bard and Bard Peripheral Vascular, Inc.*, Case No. 2:16-cv-00263-DGC without prejudice. Each party to bear their own fees and costs.

1  
2 Dated: February 6, 2020

Respectfully submitted,

3 s/ Ramon Rossi Lopez

4 Ramon Rossi Lopez  
5 rlopez@lopezmchugh.com  
6 LOPEZ MCHUGH LLP  
7 100 Bayview Circle, Ste. 5600  
8 Newport Beach, CA 92660  
9 P: 949.737-1501  
10 F: 949.737.1504

Attorney for Plaintiffs

9 s/ Richard B. North, Jr.

10 Richard B. North, Jr.  
11 Matthew B. Lerner  
12 richard.north@nelsonmullins.com  
13 matthew.lerner@nelsonmullins.com  
14 NELSON MULLINS RILEY & SCARBOROUGH LLP  
15 201 17th St. NW, Ste. 1700  
16 Atlanta, GA 30363  
17 P: 404.322.6000  
18 F: 404.332.6397

Attorney for Defendants